U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT

I. HEADING

DATE: September 19, 2003

SUBJECT: Pollution Report for the Former Statler Hilton Hotel Site, Time-Critical Removal Action, Detroit, Wayne County, Michigan

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POLREP 1 and Initial

Start Date: September 2, 2003

II. BACKGROUND

Site No.:	B55A
Delivery Order Number:	003
Response Authority:	CERCLA
CERCLIS ID Number:	Pending
NPL Status:	Not on NPL
MDEQ Notification:	8/2002
Latitude/Longitude:	42° 20′ 07″N ,83°03′05″W
Start Date:	September 2, 2003
Completion Date:	TBD

III. SITE INFORMATION

A. Incident Category

CERCLA- Fund-lead, Time Critical Removal Action

B. Site Description

1. Site Background

A. Site Location

The Former Statler Hilton Hotel Site (Statler Hilton Site) site is located at at the corner of Grand Circus traffic circle and 1539-1565 Washington Avenue in downtown Detroit, Wayne County, Michigan. The site is located directly south of the Grand Circus Park and is several hundred yards to the southwest of Comerica Park (the major league baseball facility). Commercial buildings surround the Statler Hilton Site to the east, west, and south of the former hotel building. The site includes one main multi-story building and a smoke stack. The site coordinates are 42°20'07"N latitude and 83°03'05"W longitude. There are 10 identified and stripped-out PCB transformers, a sub-basement full of PCB contaminated water, and numerous spill areas where PCBs have saturated the debris, dust, and concrete of the facility floor. Nine of the ten transformer carcases are located in the basement near the access area to the building from outside populations which was noted during the assessment activities. The last transformer carcase is located on the fourth floor of the building.

B. Site Description

The former hotel was constructed in the early 1900's by hotel developer E.M. Statler. The hotel transferred ownership several times in over six decades of operation before it closed in 1975. After the hotel ceased operating as a business, an auction was held to sell off the contents and items of the building. The hotel building then set idle, except for unauthorized entrants, for a 25-year period of time. In 2000, MDEQ initiated an asbestos and debris removal inside the former hotel building. MDEQ expended approximately 4.3 million dollars of state funds to remediate environmental issues in this building. Near the end of the asbestos abatement project, MDEQs environmental contractor discovered the presence of transformer carcases in the basement and on the fourth floor of the building which potentially once housed PCB oils. Subsequent wipe sampling of suspected spill areas in the basement and on the fourth floor of the building revealed the presence of PCB contamination as high as 480,000 micrograms/wipe. MDEQ also determined that PCBs had migrated into water in the sub-basement of the facility. MDEQ disposed of the water, but the sub-basement has re-charged with water.

In August 2002, MDEQ referred the Statler Hilton Site to the U.S. EPA to assist in an environmental assessment, securing of the facility and performing a time-critical removal action. The referral letter also stated that MDEQ did not know the lateral extent of the contamination and had expended all available funding to address the problems at the site.

IV. RESPONSE INFORMATION

A. Current Situation:

On October 31, 2002, U.S. EPA mobilized it's Superfund Technical Assessment and Response Team (START) contractors to the Statler Hilton site. START assisted U.S. EPA in performing a site assessment including sample collection and documentation of site conditions. During the

assessment, U.S. EPA noted several un-secure areas of the building that exhibited recent evidence that trespassers were continuing to enter and use the building for unknown purposes.

Results of the U.S. EPA assesment revealed that PCBs were present in dust/debris of the facility floor as high as 3,400 ppm.

U.S. EPA has mobilized removal contractors and initiated a fund-lead removal action at the site.

B. Actions Taken:

- On September 2, U.S. EPA and it's contractors mobilized to site. Electricity for site operations and the Command Post area were established. Off-hours site security was initiated.
- On September 3, site set-up continued. The hot zone, contamination reduction zone and personal decontamination areas were established. One water sample from the flooded sub-basement was collected for a full scan analysis. The results will determine if water can be disposed into the sanitary sewer.
- On September 4, a sweep of the entire building was conducted and the location of all transformers (in the basement and on the 4th floor) was documented. Cleaning of PCB-contaminated debris was initiated in the basement.
- On September 5, two background air samples were collected for PCB analysis to support Health and Safety operations. One sample location was in the front of the building on Washington Blvd and the second one was to the rear of the building on Bagley Street. The removal of transformers from the basement was initiated. Removal of PCB-contaminated debris continued. The removed debris was placed in an on-site roll-off box for future disposal.
- On September 6, two additional PCB air samples were collected. The two sample pumps were placed on workers to determine the level of PCB airborne exposure in the workzone. The small transformer on the 4th floor was removed and the associated spill area was decontaminated. Nine wipe samples were collected from the fourth floor transformer area and submitted for PCB analysis to determine the effectiveness of the decontamination solution. Concrete core samples will be collected for confirmation of cleanup completion of this area. PCB-contaminated debris removal continued. Several capacitors with suspected PCB-contaminated oil were discovered in the basement.
- On September 7, the cleanup activities continued. The main transformer area in the basement was scraped and the debris was staged. Liquid material in this cleanup area was solidified and staged with the other solid debris.
- On September 8, removal of the transformers continued. The staged debris was transferred to the on-site roll-off box. The OSC delivered the site emergency contingency plan to local authorities. The oil from the capacitors in the basement was contained in 55-gallon drums which were then staged for removal.
- On September 9, PCB-contaminated debris removal continued from basement area. A portion of the basement floor was swept with power sweeper to remove debris on floor. Suspected asbestos containing material was encountered in one of the work areas and needed to be removed appropriately to complete work in this area.
- On September 10, five transformers were removed from the basement and staged for disposal. Scarifying of the 4th floor spill area was initiated. Seven solid samples were collected from random areas in the basement to help determine the extent of contamination. All samples were submitted to the lab for PCB analysis. 24-hour site security was initiated due to issues with vandalism and trespass.
- On September 11, removal of the transformers from the basement continued. Plastic sheeting was placed within the ground level hot zone and all transformers were staged in this area. The transformers were then wrapped with plastic and taped.

- On September 12, all transformers except one were removed from the basement and staged for disposal. Scarifying of the 4th floor spill area continued.
- On September 15, the 4th floor spill area scarifying and cleanup was completed. The area will be core sampled to verify the cleanup goal has been met. The removal of the last transformer from the basement was completed. All transformers are staged awaiting disposal. Removal of PCB-contaminated debris continued.
- On September 16, the capacitors were removed from the basement and staged with the transformers for disposal. The scarifying of one of the the transformer areas in the basement was initiated. PCB-contaminated debris removal continued.
- On September 17, the transformer carcases and capacitors were transported off site for disposal. Concrete core samples were collected from the 4th floor spill area for verification that the cleanup goal had been achieved.
- On September 18, scarifying of the basement floor continued. One water sample was collected from the sub-basement for analysis for disposal. Concrete core sampling of the 4th floor was completed and the samples were submitted to the lab for PCB analysis.
- On September 19, clean-up and removal of debris on basement floor continued. 20 yards of PCB-contaminated solid debris was transported off site for disposal.
- On September 20,. physical removal of PCB contaminated debris from the basement continued. Physical scraping and removal of loose debris from large pieces of equipment and building structures in the contaminated area of the basement was initiated.
- On September 21, no site work occurred. 24-hour security remained on site.

C. Next Steps

- Continue waste removal activities until all PCB-contaminated material has been removed.
- Continue 24-hour site security.
- Remove and dispose off-site approximately 450,000 gallons of contaminated water from the sub-basement.

D. Key Issues

- The City of Detroit Department of Environmental Affairs has been actively assisting U.S. EPA in coordination of city resources to assist with this project.

V. COST INFORMATION

Estimated site costs as of September 20, 2003

START	$ 13,420
U.S. EPA	$ 9,925
ERRS	$ 180,940
	$ 204,285

VI. Disposition of Wastes

Wastestream	Medium	Quantity Disposed
PCB contaminated transformer carcasses and capacitors	Solid	22,500 Kilograms

PCB-contaminated Solid Debris	Solid	20 yards